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7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEBRASKA**  
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10 ALEJANDRO VALLESILLO, individually, and  
11 on behalf of all others similarly situated,

12 Plaintiff,

13 v.

14 VANGUARD EQUITIES, LLC, a New York  
15 Limited Liability Company, and JEROME  
16 CERILLO, an individual,

17 Defendants.

Case No.: 8:24-cv-467-JFB-MDN

**AFFIDAVIT OF ALEJANDRO  
VALLESILLO IN SUPPORT OF  
PLAINTIFF'S MOTION FOR DEFAULT  
JUDGMENT ON VANGUARD EQUITIES  
LLC**

18 I, Alejandro Vallesillo, hereby declare the following in support of Plaintiff's Motion for Default  
19 Judgment on Vanguard Equities LLC ("Vanguard"):

- 20 1. I am an adult over the age of 18 and I am competent to testify to the matters stated herein.
- 21 2. This declaration is based on personal knowledge of the matters set forth herein.
- 22 3. I am the Plaintiff in the above captioned lawsuit.
- 23 4. On October 2, 2024, at 3:21p.m., I received an unsolicited text message advertising loans  
24 from Vanguard.
- 25 5. On October 22, 2024, at 3:42p.m., I received an unsolicited text message advertising loans  
26 from Vanguard.
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1 6. On November 5, 2024, at 3:44p.m., I received an unsolicited text message advertising  
2 loans from Vanguard.

3 7. On November 20, 2024, at 3:39p.m., I received an unsolicited text message advertising  
4 loans from Vanguard.

5 8. On March 17, 2024, at 12:17p.m., I also received an unsolicited text message advertising  
6 loans from Vanguard.

7 9. On March 17, 2024, at 3:51p.m., I also received an unsolicited text message advertising  
8 loans from Vanguard.

9 10. Attached as Exhibit "A" is an example of one of the texts I received.

10 11. Prior to receiving these texts, I had never heard of Vanguard, nor did I ever consent to  
11 receiving calls from Vanguard.  
12

13  
14 I declare under penalty of perjury that the foregoing is true and correct. This declaration is  
15 executed on the date mentioned below in Omaha, Nebraska.  
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17 Dated: \_\_\_\_\_

18 By: \_\_\_\_\_  
19 Alejandro Vallesillo  
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